

WILLIAMS & CONNOLLY LLP

Barry S. Simon (admitted *pro hac vice*)
Jonathan B. Pitt (admitted *pro hac vice*)
725 Twelfth Street NW
Washington, DC 20005
Telephone: (202) 434-5000
E-mail: bsimon@wc.com
E-mail: jpitt@wc.com

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

Jack P. DiCanio (SBN 138782)
525 University Avenue
Palo Alto, California 94301
Telephone: (650) 470-4660
E-mail: jack.dicanio@skadden.com

Attorneys for Defendants

BOIES, SCHILLER & FLEXNER LLP

David L. Zifkin (SBN 232845)
401 Wilshire Boulevard, Suite 850
Santa Monica, CA 90401
Telephone: 310-752-2400
Email: dzifkin@bsflp.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

PALANTIR TECHNOLOGIES INC.,

Plaintiff,

v.

MARC L. ABRAMOWITZ, in his individual
capacity and as trustee of the MARC
ABRAMOWITZ CHARITABLE TRUST NO.
2, KT4 PARTNERS LLC, and DOES 1
through 50, inclusive,

Defendants.

Case No. 16-cv-05857-PJH

**STIPULATION AND
[PROPOSED] ORDER TO
RESCHEDULE CASE
MANAGEMENT CONFERENCE**

1 Plaintiff Palantir Technologies, Inc. (“Palantir”) and Defendants Marc L. Abramowitz, the
2 Marc Abramowitz Charitable Trust No. 2, and KT4 Partners LLC (collectively, “Defendants”),
3 jointly stipulate, pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, to reschedule the Case
4 Management Conference currently scheduled for March 16, 2017 to April 20, 2017.

5 On October 17, 2016, the parties filed a stipulation to extend time for Defendants to file an
6 answer or responsive pleading. (Dkt. 10.)

7 On October 18, 2016, the Court extended the time for Defendants to file a responsive
8 pleading to November 15, 2016. (Dkt. 13.)

9 On November 11, 2016, the parties filed a stipulation to extend the time for Defendants to
10 file an opposition to Palantir’s Motion to Remand to December 15, 2016; for Palantir to file a
11 Reply in support of its Motion to Remand to December 30, 2016; and for Defendants to Answer or
12 Otherwise Respond to Palantir’s First Amended Complaint to January 8, 2017. (Dkt. 21.) The
13 stipulation to extend time was based on a desire of the parties to further engage in settlement
14 discussions.

15 On November 15, 2016, the Court extended the time for Defendants to file an opposition to
16 Palantir’s Motion to Remand and to answer or otherwise respond to Palantir’s First Amended
17 Complaint and extended the time for Palantir to file a reply in support of its Motion to Remand.
18 (Dkt. 24.)

19 On December 28, 2016, the parties filed a stipulation to extend the time for Plaintiff to file
20 a reply in support of its Motion to Remand to January 30, 2017 and to reschedule the hearing for
21 the Motion to Remand until February 15, 2017; for Defendants to answer, move to dismiss, or
22 otherwise respond to Palantir’s Amended Complaint to February 7, 2017; and to reschedule the
23 Case Management Conference until February 16, 2017. (Dkt. 26.) The stipulation to extend time
24 was based on a desire of the parties to further engage in settlement discussions.

25 On January 3, 2017, the Court extended the time for Plaintiff to file a reply in support of its
26 Motion to Remand and rescheduling the hearing for the Motion to Remand; for Defendants to
27 answer, move to dismiss, or otherwise respond to Palantir’s Amended Complaint; and rescheduling
28 the Case Management Conference. (Dkt. 27.)

1 On January 25, 2017, the parties filed a stipulation to reschedule the Case Management
2 Conference set for February 16, 2017 to March 16, 2017. (Dkt. 29.)

3 On January 30, 2017, the Court rescheduled the Case Management Conference scheduled
4 for February 16, 2017 to March 16, 2017. (Dkt. 30.)

5 On February 3, 2017, the parties filed a stipulation to extend the time for Defendants to
6 respond to the First Amended Complaint and holding such response in abeyance pending
7 resolution of the Motion to Remand. (Dkt. 32.)

8 On February 6, 2017, the Court extended the time for Defendants to respond to the First
9 Amended Complaint and holding such response in abeyance pending resolution of the Motion to
10 Remand. (Dkt. 33.)

11 Counsel for Palantir has conferred with counsel for Defendants and the parties have agreed
12 to reschedule the case management conference currently set for March 16, 2017 to April 20, 2017.

13 IT IS HEREBY stipulated by the undersigned counsel that the Case Management
14 Conference is rescheduled to April 20, 2017.

15 Dated: February 23, 2017

Respectfully submitted,

16 By: /s/ David L. Zifkin
17 David L. Zifkin (SBN 232845)
18 BOIES, SCHILLER & FLEXNER LLP
19 401 Wilshire Boulevard, Suite 850
20 Santa Monica, CA 90401
21 Telephone: 310-752-2400
22 Email: dzifkin@bsflp.com

Attorneys for Plaintiff

By: /s/ Barry S. Simon
Barry S. Simon (admitted *pro hac vice*)
Jonathan B. Pitt (admitted *pro hac vice*)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street NW
Washington, DC 20005
Telephone: (202) 434-5000
E-mail: bsimon@wc.com
E-mail: jpitt@wc.com

Jack P. DiCanio (SBN 138782)
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
525 University Avenue
Palo Alto, California 94301
Telephone: (650) 470-4660
E-mail: jack.dicanio@skadden.com

Attorneys for Defendants

1 Pursuant to Civil Local Rule 5-1(i), the filer attests that concurrence in the filing of this
2 document has been obtained from the signatories above.

3 /s/ David L. Zifkin
4 David L. Zifkin

5
6 **[PROPOSED] ORDER**
7

8 PURSUANT TO STIPULATION, IT IS SO ORDERED. The Case Management
9 Conference in the above-entitled action is rescheduled to April 20, 2017.

10
11
12 THE HONORABLE PHYLLIS J. HAMILTON
13 UNITED STATES DISTRICT JUDGE
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28